



To: All Vermont Medicaid PIP/EHRIP participants
From: Siciliano, Lorraine
Sent: Friday, December 6, 2019 3:19 PM
Subject: VT Medicaid PIP/EHRIP Update 12/06 /2019: PY19 Applications; Penalties for not participating for PY2019? SRAs; CQMs in MAPIR

To All Vermont Medicaid Promoting Interoperability/EHR Incentive Program participants:

PROGRAM YEAR 2019 APPLICATION SUBMISSIONS: JANUARY 2nd – FEBRUARY 29th, 2020

MAPIR will be available to accept Program Year 2019 PIP/EHRIP applications as of January 2, 2020, and the deadline to submit will be February 29th, 2020.

WHAT IF A PROVIDER WILL NOT BE PARTICIPATING IN THE PIP FOR A PY2019 INCENTIVE?

Many practices are upgrading their EHR systems to 2015 Edition CEHRT, or switching EHR system vendors, and will not have a full 90 days of Promoting Interoperability Program data to report for 2019. Other providers have found that the Stage 3 Objectives and Measures are more challenging to meet as they continue to adjust their clinical workflows to meet their EHR vendor processes. If a provider will **not** be submitting an application for PY2019, there are **no penalties** for Medicaid providers who cannot meet Stage 3 Meaningful Use. They may simply skip a year and resume participation when they are able. However, if providers are subject to **Medicare** Quality Payment Program requirements, they will need to confirm that they are not subject to **Medicare payment adjustments** if they will not be able to meet those reporting obligations: <https://qpp.cms.gov/mips/exception-applications>.

PROGRAM YEAR 2019 SRA: CONDUCT OR REVIEW BY 12/31/19

All providers applying for a Promoting Interoperability/EHR Incentive Program payment must submit a Security Risk Analysis along with their application. The SRA must be conducted **or reviewed** for each Program Year an Eligible Provider applies for a PIP/EHR Incentive Program payment. It is acceptable for the SRA to be conducted or reviewed outside the 90-Day PIP/EHR reporting period; however, the SRA or review:

- Must be unique for each PIP/EHR reporting period;
- The scope must include the full PIP/EHR reporting period, and;
- Must be conducted within the calendar year of the PIP/EHR reporting period: **January 1st – December 31st.**

Please ensure all documentation submitted to support a PIP/EHRIP attestation contains **DATES** when the **SRA was conducted or reviewed**. More information about SRA requirements can be found at our website: <https://healthdata.vermont.gov/ehrip/SRA>

CLINICAL QUALITY MEASURES IN MAPIR FOR PY2019

Examples of the MAPIR screens for PY2019 eCQM data entry are available here:

[2019_12_06_CQM_Screenshots_PY2019_MAPIR_6.2](#)

For additional guidance on Clinical Quality Measures, see our [PY2019 webpage](#).

Schedule a consultation with the Vermont Medicaid PIP/EHRIP Team to prepare for PY2019 attestation.

If you are aware of anyone who would like to receive our PIP/EHRIP email updates, or if you would like to be removed from this distribution list, please forward the updated information to ahs.dvhaEHRIP@vermont.gov.

Thank you,
Lorraine Siciliano



Promoting Interoperability Program/Vermont Medicaid EHR Incentive Program

Email: ahs.dvhaEHRIP@vermont.gov

Website: <https://healthdata.vermont.gov/ehrip>